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November 23, 2015

## BY ECF

Honorable P. Kevin Castel United States District Court Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

Re:

United States v. Jason Galanis, et al.

USDC, Southern District of New York Case No. 15 CR 643 (PKC)

Dear Judge Castel:

The undersigned represent defendant Jason Galanis in connection with the above-referenced action. We write, with the Government's consent, to respectfully request a two-week extension from November 23, 2015 to December 7, 2015 for Jason Galanis to meet his bail conditions.

Defendant's previous request sought an extension until November 23, 2015 and was granted on November 5, 2015 [Dkt. No. 65]. Since that time, Jason Galanis' final signatory was identified and interviewed, and all four signatories intend to sign his bond today, November 23, 2015. The real property has also been identified, but it has taken longer than expected to execute the necessary documents to pledge as security. We believe the final steps involved with pledging the real property can be completed within the next two weeks.

Thus, with the consent of the Government, we respectfully request that Your Honor extend the deadline for Jason Galanis to meet his bail conditions until Monday, December 7, 2015. Should Your Honor have any questions with respect to this application, please do not hesitate to contact me.

Respectfully submitted,

Thomas P. Mazzucco

Aaron K. McClellan

cc: Assistant United States Attorney Brian Blais (via email)

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